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21 In re: MGM Resorts International Data Breach
22 Litigation

23 Case No.: 2:20-cv-00376-GMN-NJK

24 **STIPULATION AND [PROPOSED]**
ORDER REGARDING
MODIFICATION OF SCHEDULE
(Second Request)

1 Pursuant to Federal Rule of Civil Procedure 16 and Civil Local Rules IA 6-1 and 6-2,
2 Plaintiffs and MGM, by and through their counsel of record, stipulate to and request that the Court
3 enter an order briefly extending the case schedule as follows. This is the Parties' second request to
4 modify the case management schedule.

5 WHEREAS, on December 29, 2022, the Court entered a schedule setting deadlines for
6 disclosure of class certification experts and the filing of Plaintiffs' motion for class certification
7 (ECF No. 143);

8 WHEREAS, the Court instructed the Parties to file any request to set a briefing schedule as
9 to Plaintiffs' motion for class certification on the docket of the judge overseeing that motion (ECF
10 No. 143 at 1 n.1);

11 WHEREAS, on November 7, 2023, the Parties filed their first request to modify the case
12 management schedule, seeking an extension of three months as to certain deadlines, including the
13 deadlines for the disclosure of class certification experts and Plaintiffs' motion for class
14 certification (ECF No. 175);

15 WHEREAS, on November 8, 2023, the Court granted the Parties' request to modify the
16 case management schedule (ECF No. 180);

17 WHEREAS, pursuant to that extension, Plaintiffs' initial class certification expert
18 disclosures are due on April 18, 2024;

19 WHEREAS, on March 15, 2024, Plaintiffs filed a motion to compel production of
20 responses to Plaintiffs' Fourth Set of Requests for Production (ECF No. 209) as well as a motion
21 to compel certain Rule 30(b)(6) testimony (ECF No. 211);

22 WHEREAS, both motions ask the Court to compel MGM to provide information that
23 Plaintiffs believe is important to Plaintiffs' expert report(s);

24 WHEREAS, both motions to compel are currently pending before the Court;

25 WHEREAS, the Parties have conferred and agree that it is more efficient to serve their
26 expert reports and begin expert discovery after the Court resolves those motions to compel;

27 WHEREAS, the Parties accordingly seek a short extension of the expert disclosure

1 deadlines in order to allow the Court to rule on Plaintiffs' motions to compel;

2 WHEREAS, in conjunction with their request for an extension to the expert disclosure
 3 deadlines, the Parties request a briefing schedule as to Plaintiffs' Motion for class certification and
 4 as to *Daubert* motions;

5 Now therefore, **IT IS HEREBY STIPULATED AND AGREED** between the Parties, and
 6 subject to Court approval, that the case schedule is set as follows:

Event	Prior Deadline (ECF No. 175)	(Proposed) Deadline
Initial class certification expert reports	April 18, 2024	July 24, 2024
Motion for class certification	July 24, 2024	July 24, 2024
Defendants' class certification expert reports	June 4, 2024	September 6, 2024
Opposition to motion for class certification	N/A	September 6, 2024
MGM's deadline for motions to exclude Plaintiffs' class certification experts	April 24, 2024	September 6, 2024
Reply ISO motion for class certification	N/A	September 27, 2024
Plaintiffs' deadline for oppositions to MGM's motions to exclude class certification experts	N/A	September 27, 2024
Plaintiffs' deadline for motions to exclude MGM's class certification experts	N/A	October 11, 2024
MGM's deadline for oppositions to motions to exclude MGM's class certification experts	N/A	October 25, 2024
MGM's deadline for replies ISO motions to exclude Plaintiffs' class certification experts	N/A	October 7, 2024
Deadline for depositions of Plaintiffs' class certification experts	July 3, 2024	August 23, 2024
Deadline for depositions of Defendants' class certification experts	July 3, 2024	September 23, 2024
Plaintiffs' deadline for replies ISO motions to exclude MGM's class certification experts	N/A	November 1, 2024
Private mediation deadline	October 17, 2024	October 17, 2024
Joint status report regarding private mediation	October 24, 2024	October 24, 2024

26 IT IS SO ORDERED.

27 Dated: April 12, 2024

28 
 United States Magistrate Judge

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/s/ Miles N. Clark

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